

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



August 17, 2001

TO: PARTIES OF RECORD IN RULEMAKING 00-10-002

The following documents are transmitted with this letter:

1. A draft decision of Commissioner Wood;
2. Attachment A to the draft decision (the report of Exponent titled "Recommendations Regarding Exemptions from Rotating Power Outages");
3. Instructions on how to file and serve comments on the draft decision;
4. Reminder on mailing Statement of Authenticity;
5. An Assigned Commissioner's Ruling (ACR) regarding applications by agencies which provide police, fire and prison services; and
6. An ACR regarding creation of a special service list.

The draft decision will be on the Commission's September 6, 2001 meeting agenda. The Commission may act then, or it may postpone action until later. When the Commission acts on a draft decision, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own decision. Only when the Commission acts does the decision become binding on the parties.

A shortened comment period for the draft decision is adopted. (Rule 77.7 of the Commission's Rules of Practice and Procedure.) As a result, comments on the draft decision must be filed and served by 5:00 p.m. Monday, August 27, 2001. Only limited service of comments is required, as explained in the instructions on how to file and serve comments. Reply comments may not be filed and served. Finally, comments may be filed on the ACR regarding creation of a special service list. These comments must be in a separate document from comments on the draft decision. Instructions for service of these comments are stated in the Ruling.

/s/ LYNN T. CAREW

Lynn T. Carew, Chief
Administrative Law Judge

LTC:eap

Attachments

Decision **DRAFT DECISION OF COMMISSIONER WOOD**
(Mailed August 17, 2001)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking into the operation of interruptible load programs offered by Pacific Gas & Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company and the effect of these programs on energy prices, other demand responsiveness programs, and the reliability of the electric system.

Rulemaking 00-10-002
(Filed October 5, 2000)

**INTERIM OPINION
ON CATEGORY M EXEMPTIONS FROM ROTATING OUTAGES**

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Attachment A – “Recommendations Regarding Exemptions from Rotating Power Outages” prepared by Exponent, August 2001	
Attachment B – Electric Generator Applicants	
Attachment C – Presiding Officer and Assigned Commissioner’s Ruling dated August 17, 2001 Regarding Treatment of Category M Applications by Police, Fire and prisons as Applications for Category A	
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1. Summary

Nearly 10,000 customers applied by the June 4, 2001 deadline to be essential customers normally exempt from rotating outages based on public health and safety (Category M). Those applications are considered in this decision. Late or incomplete applications are not considered.

We find many of 41 electric generator applicants to be essential customers under essential customer Categories F and K. (See Attachment B.) The remaining electric generator applications need further analysis to determine whether or not they are net contributors to their circuit. Utilities must submit a report regarding circuit net generation for these customers within 30 days.

We treat 51 applications from customers who provide police, fire and prison services as applications for Category A. We refer these applications to respondent utilities. (See Attachment C.)

We find 405 customers eligible for Category M. (See Attachment D.) Respondent utilities must exempt involved circuits from rotating outages within 10 days of the date of this order, or within 10 days of being notified by the Energy Division Director as additional customers become exempt. The Category M status granted by this order expires in 24 months.

Customers who have not yet submitted the required Statement of Authenticity are not exempt until they submit this Statement. They must do so within 60 days of the effective date of the decision, or their eligibility expires.

Respondent utilities must notify Category M customers as circuits are exempted, and 30 days before the Category M status expires. Utilities must submit certain reports to ensure actions are undertaken promptly, and to permit further Commission action, if necessary. Finally, we adopt limited procedural

modifications to limit otherwise burdensome service of comments, and applications for rehearing.

2. Background

By Decision (D.) 01-05-089 adopted on May 24, 2001, the Commission added Category M to the list of essential customers normally exempt from rotating outages. Category M is: “limited other customers as necessary to protect public health and safety, to the extent exempted by the Commission.”

To facilitate implementation of Category M for Summer 2001, the Commission determined that it was necessary to contract for outside assistance on an expedited basis. This determination was based on the extraordinary circumstance of alleviating unacceptable jeopardy or imminent danger to the general public health and safety from rotating outages during Summer 2001. (D.01-05-089, Finding of Fact 2, Conclusion of Law 5.) The Commission invited competitive bids, and hired Exponent as the consultant and advisor for this project.

To further expedite Category M procedures, the Commission also approved and confirmed a May 21, 2001 Assigned Commissioner’s Ruling (ACR). (D.01-05-089, Ordering Paragraph 1, mimeo. p 12.) The ACR established a process to consider non-residential customer requests to be included in Category M. Further, it directed that Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) each provide direct mail notice of the process to each non-residential customer within four business days of the date of the ruling.

In brief, the adopted process permitted each non-residential customer of PG&E, SCE or SDG&E to file an application seeking Category M essential customer status.¹ Each applicant was strongly encouraged to submit its application electronically using the form on a Commission web page dedicated to this project. Applicants without internet access were directed to a toll-free number for further assistance.

Each applicant was required to demonstrate that its inclusion in a rotating outage would present imminent jeopardy or danger to public health and safety. Applicants were specifically advised that claims of economic harm or inconvenience would not be considered. Applicants were also advised that each applicant would be required to state under penalty of perjury that the application was true and correct by submission of a Statement of Authenticity.

Further, applicants were informed that the number of customers who may eventually be exempted is severely limited. As a result, the process included both the review of each application to determine the risks posed to public health and safety, and the prioritization of all applications based on those risks. Moreover, the adopted process required utilities to analyze the effects on electric system load and reliability if exemptions are granted, and measurement of those results against the Commission's standard of maintaining at least 40% of all customers eligible for rotating outage. The process provided for the filing and

¹ The ACR established a process for each customer to file a 'petition' for Category M status. Over the course of the project, the term 'application' became commonly used. As a result, we use the term application in this decision with the same meaning as petition. Using the term application will minimize reader confusion for those who applied using the Commission's web page, or are otherwise not familiar with use of the term petition.

service of a draft decision upon which applicants and parties could comment. Finally, the ACR provided that the Commission decision would be based on each petition, the consultant's report and recommendations, the load/system analysis, any other data or analysis submitted at the Commission's or consultant's request, the customer's verification of the truth of the application, and comments on the draft decision.

Applications were due no later than June 4, 2001.² A total of 9,522 complete applications were filed by that deadline.

Applicants were advised that pleadings filed after June 4, 2001 would be considered only if conditions permit additional exemptions. A final deadline for late applications was set, with applications permitted only through June 15, 2001.

Exponent's analysis and report, and this decision, address applications received through June 4, 2001. Late applications will be considered in a subsequent decision, to the extent system conditions and Commission resources permit.

3. Exponent Report and Results

Exponent submitted its report to the Commission on August 9, 2001. (See Attachment A.) The report explains in detail the application process, Exponent's analysis, and Exponent's recommendations.

3.1 Methodology and Analysis

Exponent applied several tools to rank applicants in order of risk to public health and safety, and identify customers which it recommends be considered for

² The original deadline of June 1, 2001 was extended to June 4, 2001, due to the large number of applications. (June 1, 2001 ACR.)

Category M. First, Exponent developed a numeric risk index score based on self-reported information by each applicant. The risk index score is based on three health outcome factors: (a) severity, (b) likelihood, and (c) affected population. These factors are assessed for two outage durations: (a) less than 2 hours, and (b) 2 to 4 hours. The values for each health outcome factor are multiplied by the outage duration probability to yield a quantitative risk index score.

Applicants were sorted into 42 business groups. Applicants already classified by their utility company as essential customers were identified and removed, since these applicants need not be considered further for Category M.³ Similarly, applications from electricity generators were identified and removed from further ranking, since these applications are primarily based on contribution to the electricity grid and only indirectly on potential health and safety impacts.

Initial results showed a large degree of variability. Outlier applicants (i.e., applicants with a risk index score greater than four standard deviations from the mean of their business group) were given follow-up interviews to assess whether or not their facilities faced risks substantially different from those of other applicants in their peer group. Absent individual justification for a high risk index score, each outlier applicant's score was adjusted to reflect the upper end of peer group results.

Second, a panel group study and an expert panel review were used to assess risk results. The panel group and expert review were used because of

³ The Commission identifies 14 groups as essential customers, classified into Categories A through N. (See D.01-06-085, Appendix A.) Applicants not given further consideration for Category M here are already in Categories A through L or N.

inherent limitations in relying solely on risk index scores. Individual applicants, for example, may have overestimated or underestimated adverse health and safety effects, resulting in risk index scores that are relatively too high or too low. Further, risk index scores rely on a somewhat narrow interpretation of risk. That is, applicants might make systematic judgments about the level of risk not strictly tied to objective measures. Instead, perceived (and self-reported) risk might differ from actual risk.

The panel group and expert panel review were used to correct for these limitations. The panel group was used to make broad judgments about a number of potentially risky situations, in contrast to each applicant judging only their own facility. Representatives of the various business groups that requested exemption from outages were invited to participate. Applicants for exemption were not invited. Thus, participants had knowledge of their industries, but no particular vested interest in the outcome.

An Exponent expert panel also reviewed a subset of application responses regarding reported hazards, and prepared a list summarizing hazards for each business group. This information was presented and reviewed during the panel group study. The panel group results were used to assess applicant bias, and tap a range of concerns that influence public attitudes about potential risks.

Third, Exponent identified 51 applicants from the list of 9,522 that are police departments, fire departments or high-security prisons but who are not currently exempt within existing essential customer categories. Exponent recommends that these applicants be treated independently of their risk index score.

Finally, Exponent individually reviewed the top 2,000 applicants based on calculated risk index scores, and applied 17 screening criteria to further

narrow the list. (See Attachment A, pages 6-1 to 6-5 for the 17 screening factors.) From this review, 1,595 of the top 2,000 applicants were found to present relatively less risk to public health and safety. This leaves a list of 405 customers, ranked in order of relative risk to public health and safety.

3.2 Exponent's Recommendations

Based on its analysis, Exponent recommends that the 51 police, fire and prison applicants not already in an essential customer category be given the highest priority for exemption. Exponent makes this recommendation since, according to Exponent, the Commission currently grants exemptions to many similar facilities. Exponent points out, however, that many of these applicants have backup generation and may not need exemption, thereby preserving the number of potentially available exemptions for others.

Further, of the list of 405 customers, Exponent recommends that the Commission grant as many exemptions as possible. Exponent suggests the Commission base that determination on other influencing factors, such as circuit load analysis and compatibility with earlier Commission decisions. For example, exemptions should be compatible with prior decisions requiring the maintenance of at least 40% of load available for rotating outage to avoid involuntary load shedding and general system collapse.

Exponent points out that six customers are included in the list of 405 despite being in business groups considered low risk by the focus group (i.e., medical buildings, security, retail). Exponent includes these customers, however, because upon further analysis Exponent determined that they actually provide services such as outpatient surgery, or communication services to support vital law enforcement activities. Further, at least one presents a somewhat unique

fire/explosion hazard because of a heat treatment manufacturing process. Exponent concludes that these risks are not easily mitigated by other means.

Finally, Exponent addresses skilled nursing facilities (SNFs) and dialysis treatment centers. Exponent points out that these two business types were ranked the highest by the panel study group based on their perception of a high likelihood of severe health effect or death in the event of a rotating outage. Only a few SNFs and dialysis treatment centers are within the list of 405 customers, however, because of low risk index scores based on self-reported information provided by each applicant. Exponent highlights these two business groups because of the high risk ranking given by the panel group, and the probable underreporting of potential risks.⁴ Exponent recommends that the Commission further investigate the feasibility of exempting these two business groups, despite their apparent low self-reported risk.

4. Discussion

4.1 Exponent's Methodology

Exponent applied a rational and objective methodology to determine relative risk between applicants. First, Exponent developed a risk index formula based on Exponent's experience with risk assessment. Weighting factors were

⁴ Exponent says that this discrepancy (i.e., high risk assessment by the panel group but low calculated risk index scores based on each application) can be explained in several ways. For example, according to Exponent, panel group study participants may not have understood procedures at SNFs and dialysis treatment centers well enough to properly judge risk. Also, applicants might have been reluctant to admit high levels of risk due to concerns over liability. Further, these facilities have smaller populations at risk than some emergency services and communications facilities. Finally, nursing home and dialysis treatment clinics may have appropriately estimated public health risks while other facilities may have overestimated risk.

compared to published factors used in other studies to assess reasonableness. The algorithm was tested before Category M applications were received. Second, the limitation of relying solely on the calculated risk index score was addressed by follow-up interviews with outlier applicants, along with use of a panel group and an expert panel review. Third, applicants who could reasonably qualify for essential customer status in a category other than Category M were removed from consideration to focus the limited available exemptions here on those without another course of relief. Finally, the top 2,000 applications ranked by adjusted calculated risk index score were individually reviewed, and 17 screening criteria were applied to further narrow the list.

The approach was thorough and complete. It applied the consultant's expertise, tested against published information. It utilized verification of data from outliers, assessment based on panel groups, elimination of customers otherwise eligible under other criteria, and screening based on 17 factors.

The 17 factors reasonably apply the results of the panel group, and criteria we endorse. For example, applicants (other than verified outliers) were found relatively less risky if they are in a business group ranked low in priority by the panel group (e.g., automobile repair shops, financial institutions, convenience stores, grocery stores, manufacturing plants, office complexes, churches). We agree with the perception of the panel group that these applicants present relatively less risk to public health and safety than do other applicants.

Applicants were found relatively less risky if they have an alternative source of electrical supply (i.e., backup generation) that would cover 100% of an applicant's critical health and safety needs for more than 2 hours. We agree with this criterion. There is little or no need for all ratepayers collectively to protect these customers from rotating outage when these customers can reasonably

protect themselves. As such, these applicants present relatively less risk to public health and safety than do other applicants.

Applicants were ranked lower if they are restaurants or food processing plants whose concerns pertain to food contamination. We agree, since applicable health codes prohibit the marketing of spoiled or contaminated foods, and methods exist to reasonably assess the risk of foods being spoiled or contaminated (e.g., monitoring of refrigeration temperatures).

Applicants were ranked lower if they are either a water district or water company. We agree. Absent a particular entity being a justified outlier, these entities have backup generators or storage facilities, and backflow protection systems, to reasonably mitigate danger to public health and safety from rotating outages of moderate duration.

Applicants were found relatively less risky if they do not provide a time-critical or unique service. We agree. For example, customers may be reasonably expected to wait a few hours to have a prescription filled at a pharmacy if the pharmacy is experiencing a rotating outage of up to two hours, or, if urgent, have the prescription filled at another pharmacy or a hospital. As such, these applicants present relatively less risk to public health and safety than do other applicants.

Applicants were ranked lower if the request is based on traffic control that can be mitigated by following standard traffic safety rules. We agree. Not only must citizens be expected to reasonably obey the law in such circumstances, but utilities are under both Commissioner Ruling and Governor Executive Order to provide data to public safety agencies as necessary for the agency to plan its

response to rotating outages.⁵ As such, cities can get reasonable information regarding forthcoming outages to dispatch police and other traffic safety personnel to control traffic.

Applicants were found relatively less risky if the danger to public health and safety as represented in the application could be reasonably mitigated by applicant following health codes and Occupational Safety and Health Administration regulations. We agree. We expect each business to honor all applicable laws, codes and regulations. We decline to exempt a customer from rotating outage if that customer is operating outside the law, or could on its own mitigate danger to public health and safety by reasonable application of existing public health and safety provisions in the law. As such, these applicants present relatively less risk to public health and safety than do other applicants.

The methodology employed by Exponent is reasonable in achieving the desired result. That result is a list of applicants ranked in order of presenting relative danger or jeopardy to public health and safety if the customer is not classified as an essential customer normally exempt from rotating outage.

4.2 Electric Generators

Early in its analysis, Exponent removed 41 electric generator applicants from further consideration for Category M. We agree. These applicants do not present the danger to public health and safety contemplated for successful Category M customers. Rather, their applications are better analyzed in the

⁵ See, for example, ACR dated March 28, 2001, directing PG&E to provide data which was in turn given to the City and County of San Francisco. The same ACR directed SCE to provide reasonable data to the City of Huntington Beach, or one or both parties to file a motion for release of certain information. Also see Governor's Executive Order D-38-01, dated June 1, 2001.

context of whether or not they make a positive (or at least neutral) contribution to the system if they are not subject to rotating outages. Each application must be viewed individually to make that assessment.

For example, a 1 MW generator may be on a circuit that can serve 5 MW. In this case, all other customers are better off if the entire circuit is subject to rotating outage, with 5 MW available for the rotating outage pool, rather than exclude the 5 MW from rotating outages in order to secure generation of 1 MW. That is, an exemption from rotating outage for an electric generator is reasonable for all other customers only if the generator can at least meet the needs of the circuit.

Similarly, there are cases where multiple circuits are involved. Small electric generator applicants may make a neutral or net positive contribution to their individual circuit, but ancillary services may be on another circuit (e.g., control room facilities). When viewed as a whole on the involved circuits, the generator may or may not make a neutral or positive contribution to the combined circuits, and therefore the grid.

Further, whether these 41 generators are at transmission or distribution level voltage, the load analysis must be consistent with existing treatment of transmission level customers. That is, we already permit essential customer status for customers served at transmission level voltage when they supply power to the grid in excess of their load at the time of the rotating outage, or their inclusion in rotating outages would jeopardize system integrity. (Category K of the essential customer list; see D.01-04-006, Attachment C.)

All 41 applications were examined on this basis, and many are found to make reasonable contributions to their circuit, or local combination of circuits, and merit exemption. On this basis, we grant these applicants essential customer

status normally exempt from rotating outage. These customers are included as essential customers in Category F when at distribution level (i.e., “electric utility facilities...critical to continuity of electric power system operation”), and in Category K when at transmission level. These customers are listed in Attachment B.

Load and resource analysis continues on a few applicants, as noted in Attachment B. Each utility shall submit a report within 30 days stating the final load and resource assessment of these remaining few customers. The report shall be filed, served on the remaining few electric generator customers at issue, and served on a limited list at the Commission composed of Commissioner Wood, Administrative Law Judge (ALJ) Mattson, ALJ Galvin, Jonathan Lakritz, and Laura Martin. Parties may file and serve comments on the report within 10 days, with service on the respondent utility, plus the same service list as used for the report.

4.3 Police, Fire, Prisons

Exponent recommends that 51 Category M applicants who are police, fire and high security prison customers not already in Category A be given the highest priority for exemption, since, according to Exponent, the Commission currently grants exemptions to many similar facilities. We generally agree, but believe these applicants, if essential customers, should be included in Category A.⁶

⁶ Category A is: “Government and other agencies providing essential fire, police, and prison services.” (D.01-04-006, Attachment C.)

Respondent utilities must already classify qualified police, fire and prison customers as essential customers in Category A, unless a particular customer has adequate backup or standby generation. (D.82-06-021 (June 2,1982), D.01-04-006, mimeo. page 65.) We have insufficient information to determine whether or not these Category M applicants previously requested Category A status, but are not included in Category A based on an evaluation by the utility regarding the adequacy of backup or standby generation. Nonetheless, results reported by Exponent show that several of these customers have backup generation capable of meeting 100% of the customer's critical health and safety needs for more than 4 hours. This is adequate backup generation to eliminate each such customer from Category A, absent a particularly compelling reason to the contrary in any specific case.

If these customers are qualified police, fire and high security prisons without adequate standby or backup generation, they should be included in Category A. If they do not qualify for Category A, however, we are not persuaded that they present sufficient imminent jeopardy or danger to public health and safety if exposed to rotating outages to qualify for Category M.

By ACR dated August 17, 2001, respondent utilities were directed to treat these 51 Category M applications as applications for Category A. (See Attachment C.) We approve and confirm that ACR. (Pub. Util. Code Section 310.) Respondent utilities should include these 51 customers in Category A to the extent they are police, fire or prison customers without adequate backup or standby generation. (See Table 7-1 of Attachment A for a list of the 51 police, fire and high security prison applicants.)

4.4 Exponent List Ranked by Public Health and Safety Risk

Exponent recommends that the Commission exempt as many of the 405 customers as possible of those ranked by Exponent in order of relative risk to public health and safety. We agree. Exponent's list represents a reasonable relative ranking of customers presenting imminent danger or jeopardy to public health and safety if exposed to rotating outages. We are persuaded that these customers present sufficient relative risk to merit inclusion in Category M to the fullest extent possible.

We have previously determined that each utility must maintain at least 40% of its load available for rotating outages to avoid involuntary load shedding and general system collapse. (D.82-06-021, D.01-04-006, D.01-06-085.) We continue to apply this criterion here.

Respondent utilities and Commission staff analyzed the effect on load and resources of exempting up to the full list of 405 customers. The analysis shows that all 405 customers are able to be included in Category M without jeopardizing the 40% limit for each utility. Customers whose applications for Category M status are granted are listed in Attachment D. As discussed more below, applicants who have not yet submitted a Statement of Authenticity are granted Category M status conditioned upon their submitting a Statement within 60 days.

A few applications remain for further consideration based on processing difficulties. For example, some applicants appear to have transposed utility account numbers, or used a gas account number rather than an electricity account number. Staff is working with each respondent utility to determine whether each such applicant is a valid customer, or that the correct account number or other information is available to ensure an applicant granted

Category M status can be properly included by the utility. Those applicants are identified within Attachment D, and are included in Category M conditioned upon successful resolution of these processing difficulties. Staff and utilities should complete that effort within 30 days.

If the status of any applicant is unresolved at the end of 30 days, the respondent utility should file and serve a report. The report should state the customer name, unresolved issue, estimated time to resolve the issue, and the utility's recommendation. The report should be served on the involved customer, and the following persons at the Commission: Commissioner Wood, ALJ Mattson, ALJ Galvin, Jonathan Lakritz, and Laura Martin. Comments on the report may be filed and served within 10 days of the date of the report. Service should be on the respondent utility, and the same persons identified above at the Commission.

4.5 Skilled Nursing Facilities and Dialysis Treatment Centers

Exponent recommends that the Commission further investigate the feasibility of exempting all SNFs and dialysis treatment centers. We adopt this recommendation.

California has more than 1,200 SNFs. (Reporter's Transcript, March 22, 2001, Volume 3, page 399.) These facilities are located throughout the state. Each SNF is located on a circuit different from the circuit serving another SNF, with few, if any, exceptions. Exempting more than 1,200 SNFs would exempt nearly, if not exactly, that same number of circuits, along with the load of other

customers on the same circuit as the SNF.⁷ Retaining at least 40% of load for rotating outages does not allow including all SNFs in Category M at this time.⁸

From the total candidate population of these two customer types, we received Category M applications from 568 SNFs and 220 dialysis treatment centers. Exponent's list of 405 customers recommended for Category M includes 88 SNFs and 29 dialysis treatment centers. Granting Category M to the 405 (including 88 SNFs and 29 dialysis treatment centers) leaves 671 applicants from these two customer types. We are unable to grant Category M status for these 671 applicants, since there is insufficient margin left to exempt another 671 customers in addition to the 405 (i.e., expanding the number of exempt customers by 166%, from 405 to 1076).

Nonetheless, 88 SNFs and 29 dialysis treatment center are given Category M status as part of the 405. Even with some self-reporting bias, we think SNF and dialysis treatment center applicants generally reported risk relative to other SNFs and dialysis treatment centers that allowed Exponent to reasonably rank these applicants relative to each other, and relative to the other applicants within the group of 405.

⁷ If each circuit carries 5 MW of load, exempting 1,200 circuits would exempt 6,000 MW of load.

⁸ Assuming the state's summertime peak demand is 50,000 MW (D.01-04-006, mimeo. page 35), 6,000 MW of load on circuits including a SNF represents 12% of peak demand. If about 50% of summer peak load is now available for rotating outage, that means about 25,000 MW is now available for rotating outage. Removing 6,000 MW would reduce the available load from 25,000 MW to 19,000, or from 50% of total load to 38% of total load for rotating outage.

We are concerned, however, that the population within SNFs and dialysis treatment centers is among the most vulnerable in our society. Some of these patients would have been in acute care hospitals a few years ago, but are now discharged to SNFs and outpatient treatment centers.

We must for now maintain the pool of at least 40% of load from which to draw for rotating outage to prevent widespread and generalized system collapse. We do this for the good of all electricity customers, including SNFs and dialysis treatment centers, and for the overall public health and safety.

We may, however, have the opportunity to later explore other options to address risks from rotating outages. This may include application of a rotating outage pool percentage lower than 40%, given changes in technology and risk assessment. Further, utilities are rewiring some circuits to make more circuits available for rotating outage. This may in the future allow exemption of additional customers not now exempt. Also, we may subsequently take the initiative to re-examine customers now identified as essential in Categories A-L, and N. For example, we may re-examine application of the backup and standby generation criterion, resulting in removal of some customers now classified as essential. We may also evaluate the ability of some customers now classified as essential to withstand outages caused by accidents, earthquakes and other natural disasters. If certain customers are able to reasonably withstand such events, we may conclude that they can withstand temporary electricity outages from rotating outages. This may allow exemption of additional customers not now exempt.

4.6 Statement of Authenticity

We have received a Statement of Authenticity, where necessary, from most, but not all, applicants.⁹ We consider denying the applications of those who have failed to provide this Statement by the date due, but decline to do so. Rather, we think it reasonable to grant applicants a limited amount of additional time to comply with this administrative detail.

Attachments B and D show whether Statements of Authenticity have or have not been received from those applicants to whom we grant essential customer status. Where a Statement has not yet been received, we grant that applicant essential customer status conditioned upon that applicant submitting a Statement within 60 days.

A period of 60 days is a reasonable amount of time for this administrative—but important—detail to be resolved, while providing some finality to the process. We authorize the Assigned Commissioner or the ALJ to permit deviations from the 60-day time limit for good cause in an individual case, but the threshold to justify a deviation must be very high. That is, we expect any deviations to be limited to truly exceptional situations, and that this portion of the process will be concluded without unreasonable delay.

4.7 Incomplete or Late Applications

Only complete applications submitted by June 4, 2001 are considered for Category M in this decision. Incomplete applications, or applications submitted

⁹ Not all applicants were required to submit a Statement of Authenticity. Rather, only those granted essential customer status in the August 17, 2001 Draft Decision of Commissioner Wood were required to submit the Statement, with the Statement due no later than August 27, 2001 (i.e., the date comments were due on the Draft Decision).

after the June 4, 2001 deadline, are not considered at this time. We are unable to consider incomplete or late applications due to the large number of applications; limited resources available to process applications; limited resources to do follow-up interviews on applications generally; inability to do follow-up interviews on incomplete applications due to limited resources, with very few exceptions (e.g., transposed account number on the final list of 405 customers); and the limited time for reaching a decision for Summer 2001.

We further clarify that we will not devote resources to consideration of any incomplete applications. The burden reasonably rested with applicants to submit a complete application by June 4, or late by June 15. A toll-free telephone number was available for applicants to call with questions. The application could be completed in parts, with answers updated or modified, until the application was complete. In fact, electronic submission was permitted only when the form was complete. Applicants submitting their form by fax or mail could review their form to ensure that was complete, accurate and fully representative of their situation before its submission. On balance, the best use of resources while meeting the goal of promoting public health and safety does not justify consideration of any incomplete applications.

While we will not consider incomplete applications, we may later consider complete applications received after June 4, 2001, but before June 15, 2001. Subsequent consideration of late applications, if any, however, will depend upon the availability of Commission resources to process and consider late applications, and whether or not the electric system permits additional exemptions (e.g., at least 40% of system load remains available for rotating outage). Further, it will depend upon whether or not the electricity crisis

continues, with a reasonably high probability of rotating outages, thereby necessitating continuation of the Category M process.

5. Implementation

This order is effective immediately. We understand, however, that it may take a reasonable amount of time for utilities to identify circuits, and make changes necessary to ensure that rotating outages do not occur on the circuits of customers added to the essential customer group herein. Nonetheless, we expect utilities to make these changes effective no later than 10 days of the date of this order. Further, as customers are added upon submission of their Statements of Authenticity, respondent utilities shall exempt the circuits of those added customers within 10 days of the date notified by the Energy Division Director that the Statement has been received.

A period of 10 days for respondent utilities to accomplish these changes is reasonable. This decision was issued as a draft for comment in mid-August 2001. Utilities at that time may have begun to make implementation plans based on knowing the customers proposed to be found essential. Further, the urgent need to provide reasonable protection to public health and safety based on the final list of those awarded Category M status requires that each utility apply all necessary and reasonable efforts to make the required changes without delay.

Each respondent utility unable to implement all required circuit modifications within 10 days must file and serve a report. The report must state the name of the customer granted essential customer status herein whose circuit has not yet been exempted from rotating outages, the reason, an estimate of when the change will become effective, the utility's recommendation, and anything else reasonably needed for the Commission to assess the matter. The report must be filed, served on 5 individuals at the Commission

(i.e., Commissioner Wood, ALJ Mattson, ALJ Galvin, Jonathan Lakritz, Laura Martin), and served on each Category M customer affected by the delay.

Comments on the report may be filed and served within 10 days of the date of the report. Service of comments should be on the respondent utility, and the same persons identified above at the Commission.

6. Expiration in 24 months

The Category M status granted today will expire in 24 months. We do this for several reasons.

First, Category M was established due to circumstances in the electricity market requiring extraordinary steps to protect public health and safety. As Governor Gray Davis stated in his January 17, 2001 Proclamation of a State of Emergency, electricity shortages had resulted in blackouts affecting millions of Californians. Further, the Governor stated that the imminent threat of widespread and prolonged disruption of electricity constituted a condition of extreme peril to the safety of persons and property within California.

This condition, however, is not expected to be indefinite. Rather, due to actions by the Governor, this Commission, and others, we expect within 2 years to return to an electricity market that can operate reasonably well without the need for extraordinary measures.

Second, each customer awarded Category M status today should take steps to reduce or eliminate any significant risk to public health and safety which occurs if that customer is exposed to an outage from any cause, including weather, accidents, or supply shortages. That is, despite the cause, frequency, or duration, customers should take reasonable steps in the next 24 months to reduce any risk they present to public health and safety if they experience an outage.

Third, notification procedures for rotating outages (as discussed more below) are improving, and will continue to improve with experience and need. Better and more timely notification before rotating outages provides the opportunity for businesses to take necessary steps to mitigate or eliminate any jeopardy to public health and safety. This should reduce, if not eliminate, the need for the total exemption granted Category M customers.

Fourth, we do not want Category M status to forever remove incentives for Category M customers to make health and safety modifications to their operations. It is reasonable in these particularly difficult and troubled times to protect public health and safety by excusing some customers from rotating outages. This sensibly transfers the relative risk presented by some businesses to all customers. In the long run, however, we want each business itself to be exposed to the risk it places on the community in which it operates, and have the incentive to take whatever steps are reasonable to mitigate or eliminate that risk.

Finally, customers change as economic conditions evolve and time passes. New businesses enter the market, other businesses depart; some businesses grow, others contract; some businesses merge, others divest parts into new companies; and existing businesses may change the amount or type of activity that jeopardizes public health and safety.¹⁰ The award of Category M status should not be a government benefit that accrues indefinitely to only a select group of individually named customers. It should not become part of the

¹⁰ For example, a business that is granted an exemption herein because it performs some outpatient surgery, or other activity that results in it being ranked high in relative risk to public health and safety, might reduce the amount of outpatient surgery, or reduce other relatively risky activity, over time. This may reduce its relative risk ranking compared to other businesses.

economic worth of some businesses, and not others. Rather, the status awarded today is intended to address relative risk for some customers during a temporary State of Emergency.

Therefore, we limit Category M status awarded today to a period of no more than 24 months. We will not at that time eliminate Category M itself, since use of the category may continue to be necessary at intermittent times. Absent a specific Commission order to the contrary, however, Category M status granted today will expire in 24 months.

We direct each respondent utility to individually notify each customer granted Category M essential customer status in today's order that the customer's circuit is, or will become, exempt from rotating outages. In that same notice, the utility must inform the customer that such status will expire in 24 months. Further, 30 days before the expiration of Category M status, each respondent utility shall notify each customer granted this status that such status will expire 30 days after the date of that notice, absent a specific Commission order to the contrary.

7. Notice Before Rotating Outages

Several approaches are available to assist business customers reduce or eliminate danger or jeopardy to public health and safety when exposed to a rotating outage. Category M is one method. Another is advance notification.

The California Independent System Operator (ISO) now provides forecasts both 48 hours, and 24 hours, in advance of expected rotating outages. The ISO provides frequent updates to the public during periods of forecast electricity emergencies. The ISO also notifies utilities and public agencies one hour in advance of any firm load curtailment. Each utility is in turn required to notify the public and the media no less than one hour in advance of any reduction in

electricity output, including the time and location where the anticipated blackout will occur. (Executive Order D-38-01.)

Individual customers may also receive energy alerts regarding Stage 1, 2 and 3 emergencies. Customers may register on the State of California home page (<http://my.ca.gov/wireless>) to receive wireless notifications of energy alerts via pager, cell phone, or hand-held personal digital assistant. (Governor's Press Release, PRO1:323, dated July 10, 2001.) As experience is gained with this system, and improvements are made, if necessary, this advance notification is, and will become, a powerful tool to reduce and manage risk to public health and safety from outages.

Because we are unable to provide Category M status to all applicants, we are pleased that other tools are available to mitigate or eliminate danger to public health and safety. We encourage all applicants denied Category M status to take advantage of the new real-time electronic system for advance notification.

8. Limited Service of Attachment A

The draft decision of Commissioner Wood was served on all of the approximately 10,000 Category M applicants, as well as about 200 on the Phase 1 service list. The draft decision included a complete copy of the Exponent Report (Attachment A). Attachment A is in excess of 200 pages.

We do not include a copy of Attachment A with service of paper copies of the final decision because each Category M and Phase 1 party has already received a copy of the Exponent Report. Not serving paper copies of exactly the same document a second time will save substantial cost and administrative burden.

9. Limited Service of Applications for Rehearing

By D.01-08-018, we limited service of comments on the Category M draft decision. We did this because requiring a party filing a comment to serve that comment on nearly 10,000 other parties would be unreasonably burdensome, and provide little benefit. We do the same for applications for rehearing of this order.

That is, a party seeking rehearing of this order must apply for rehearing within 30 days.¹¹ (Public Utilities Code Section 1731(b).) The application for rehearing must be filed and served. (Rule 85 of the Commission's Rules of Practice and Procedure.) Service must be on all parties to the proceeding. (Rule 85.) We may, however, liberally construe our rules to secure just, speedy and inexpensive determination of the issues presented. (Rule 87.)

Service of an application for rehearing in this proceeding would require service of a copy on nearly 10,000 parties. That is unreasonable. Therefore, we limit service of applications for rehearing to only the applicant's serving utility (e.g., PG&E, SCE or SDG&E) and the following persons at the Commission: Commissioner Wood, General Counsel Cohen, ALJ Mattson, ALJ Galvin, Jonathan Lakritz, and Laura Martin.

10. Need for Expedited Consideration

Rule 77.7(f)(9) of the Commission's Rules of Practice and Procedure provides in relevant part that:

¹¹ "The application for a rehearing shall set forth specifically the ground or grounds on which the applicant considers the decision or order to be unlawful." (Pub. Util. Code § 1732.)

“...the Commission may reduce or waive the period for public review and comment under this rule...for a decision where the Commission determines, on the motion of a party or on its own motion, that public necessity requires reduction or waiver of the 30-day period for public review and comment. For purposes of this subsection, "public necessity" refers to circumstances in which the public interest in the Commission adopting a decision before expiration of the 30-day review and comment period clearly outweighs the public interest in having the full 30-day period for review and comment. "Public necessity" includes, without limitation, circumstances where failure to adopt a decision before expiration of the 30-day review and comment period...would cause significant harm to public health or welfare. When acting pursuant to this subsection, the Commission will provide such reduced period for public review and comment as is consistent with the public necessity requiring reduction or waiver.”

We balance the public interest in quickly finding limited customers eligible for Category M against the public interest in having a full 30-day comment cycle on the proposed modification. We conclude that the former outweighs the latter. Category M serves to protect public health, safety and welfare. Any delay in placing customers in Category M jeopardizes public health, safety and welfare by increasing the risk of those customers experiencing rotating outages. We seek valuable public review of, and comment on, our proposed change, and find that a reduced period balances the need for that input with the need for timely action.

11. Comments on Draft Decision

On August 17, 2001, the draft decision of Presiding Officer and Assigned Commissioner Wood on this matter was filed and served on parties in accordance with Section 311(g) of the Public Utilities Code and Rule 77.7 of the

Rules of Practice and Procedure. Comments were filed and served on August 27, 2001.¹²

Findings of Fact

1. Exponent applied a rational and objective methodology to determine relative risk between applicants using a risk index formula based on Exponent's experience with risk assessment, weighting factors which were compared to published factors used in other studies, and an algorithm that was tested before any Category M applications were received.

2. The limitation of relying solely on the calculated risk index score was addressed by follow-up interviews with outlier applicants, and use of a panel group, and an Exponent expert panel.

3. Applicants who could reasonably qualify for essential customer status in a category other than Category M were removed from consideration to focus the limited available Category M exemptions on those without another course of relief.

4. The top 2,000 applications ranked by adjusted calculated risk index score were individually reviewed, and 17 screening criteria were applied to further narrow the list.

5. The 17 screening factors apply the results of the panel group.

6. Applicants (other than verified outliers) are relatively less risky if they are in a business group ranked low in priority by the focus group (e.g., automobile

¹² Pursuant to D.01-08-018, adopted on August 2, 2001, the burden of serving comments on nearly 10,000 parties was moderated by limiting service to only 5 persons at the Commission.

repair shops, financial institutions, convenience stores, grocery stores, manufacturing plants, office complexes, churches).

7. Applicants are relatively less risky if they have an alternative source of electrical supply (i.e., backup generation) that covers 100% of an applicant's critical health and safety needs for more than 2 hours.

8. Applicants are relatively less risky if they are restaurants or food processing plants whose concerns pertain to food contamination since health codes prohibit the sale of spoiled or contaminated foods, and means exist to assess such food risks.

9. Applicants are relatively less risky if they are either a water district or water company since backup generation, storage facilities and backflow protection systems mitigate risk to the public.

10. Applicants are relatively less risky if they do not provide a time-critical or unique service.

11. Applicants are relatively less risky if the request is based on traffic control that can be mitigated by following standard traffic safety rules.

12. Applicants are relatively less risky if the potential danger to public health and safety can be reasonably mitigated by applicant following health codes, and Occupational Safety and Health Administration regulations.

13. Exponent's methodology achieves the desired result of a list of applicants ranked in order of presenting relative danger or risk to public health and safety if the customer is not classified as an essential customer normally exempt from rotating outage.

14. Electric generator applicants do not present the same danger to public health and safety as other applicants for Category M.

15. An exemption from rotating outage for an electric generator is reasonable for all other customers only if the generator can at least meet the needs of the circuit, or limited circuits where more than one electric generator applicant provides electricity.

16. Respondent utilities must already classify qualified customers providing police, fire and prison services as essential customers in Category A, unless a particular customer has adequate backup or standby generation.

17. Several police, fire and prison applicants have backup generation capable of meeting 100% of the customer's critical health and safety needs for more than 4 hours.

18. Exponent lists 405 customers by relative ranking of those presenting imminent danger or jeopardy to public health and safety if exposed to rotating outages.

19. Each utility must maintain at least 40% of its load available for rotating outages to avoid involuntary load shedding and general system collapse.

20. Exempting all 405 customers recommended for Category M by Exponent will not jeopardize the minimum 40% load available for rotating outage criterion.

21. California has more than 1,200 SNFs located throughout the state, with each SNF located on a circuit different from the circuit serving another SNF, with few, if any, exceptions.

22. Exempting more than 1,200 SNFs would exempt nearly, if not exactly, that same number of circuits, along with the load of other customers on the same circuit as the SNF.

23. Retaining at least 40% of load for rotating outage does not allow including all SNFs in Category M at this time.

24. Exponent's list of 405 customers recommended for Category M includes 88 SNFs and 29 dialysis treatment centers.

25. Category M status cannot be given to 671 SNF and dialysis treatment center applicants beyond those included in the 405, since there is insufficient margin left to exempt another 671 customers in addition to the 405.

26. A toll-free telephone number was available for applicants to call with questions.

27. Electronic submission of the application was permitted only when the form was complete.

28. Applicants submitting their form by fax or mail could review their form to ensure that was complete, accurate and fully representative of their situation before its submission.

29. The burden rested with applicants to submit a complete application by June 4, or late by June 15.

30. Category M was established due to circumstances in the electricity market requiring extraordinary steps to protect public health and safety, but these circumstances are expected to be temporary.

31. Actions taken by the Governor, this Commission, and others, will likely return the electricity market within 2 years to one that can operate reasonably well without the extraordinary steps taken by this Commission and others.

32. Electrical outages have many causes, including weather, accidents, or supply shortages.

33. Customers change as economic conditions evolve and time passes.

34. The ISO provides forecasts both 48 hours, and 24 hours, in advance of expected rotating outages, with frequent updates to the public during periods of

forecast electricity emergencies, and notifies utilities and public agencies one hour in advance of any firm load curtailment.

35. Each utility is in turn required to notify the public and the media no less than one hour in advance of any reduction in electricity output, including the time and location where the anticipated blackout will occur.

36. Individual customers may also receive energy alerts regarding Stage 1, 2 and 3 emergencies by registering on the State of California home page to receive wireless notifications of energy alerts via pager, cell phone, or hand-held personal digital assistant.

37. Notification procedures for rotating outages are improving, and will continue to improve with experience and need.

38. Better and more timely notification before rotating outages provides the opportunity for businesses to take necessary steps to mitigate or eliminate any jeopardy to public health and safety.

39. As notification improves, the need for the total exemption granted Category M customers will lessen, if not end.

40. The draft decision of Commissioner Wood was served on all of the approximately 10,000 Category M applicants, as well as approximately 200 parties and persons on the Phase 1 service list, and included a complete copy of the Exponent Report (Attachment A), which is in excess of 200 pages.

41. Not serving paper copies of exactly the same document a second time will save substantial cost and administrative burden.

42. Service of an application for rehearing in this proceeding would require service of a copy on nearly 10,000 parties.

43. The public interest in quickly finding limited customers eligible for Category M outweighs the public interest in a full 30-day period for public review and comment.

Conclusions of Law

1. Electric generator applicants should normally be exempt from rotating outage only if the exemption results in their making a positive (or at least neutral) contribution to the system absent being subject to rotating outages.

2. Electric generators listed in Attachment B, upon completion of load/resource analysis showing they are net contributors, should be treated as essential customers normally exempt from rotating outage in Category F or K, with utilities filing a report on final load analysis in 30 days on those applicants where the analysis is continuing.

3. The 51 Category M applicants listed in Exponent's Table 7-1 who are police, fire and high security prison customers not already in Category A should be included in Category A if they are otherwise essential police, fire or prison customers without adequate standby or backup generation.

4. Absent a particularly compelling reason to the contrary, an applicant able to meet 100% of its critical health and safety needs for more than 4 hours by using standby or backup generation should not be included in Category A.

5. The ACR dated August 17, 2001, should be approved and confirmed.

6. All of the 405 customers recommended by Exponent for Category M should be included in Category M.

7. Customers listed in Attachment D who have unresolved processing difficulties should be granted Category M status conditioned upon their successful resolution of the processing difficulty.

8. Customers listed in Attachments B and D who have not yet submitted a Statement of Authenticity should be granted essential customer status conditioned upon their submitting a Statement of Authenticity within 60 days.

9. The Assigned Commissioner or the ALJ should be delegated authority to permit deviations from the 60-day time limit for submission of a Statement of Authenticity, but deviations should be only for good cause in an individual case with the threshold to justify a deviation very high.

10. Respondent utilities should exempt the circuits of those customers added to Category M no later than 10 days of the date of this order.

11. As customers are added upon submission of their Statements of Authenticity, respondent utilities should exempt the circuits of those added customers within 10 days of the date notified by the Energy Division Director that the Statement has been received.

12. Each respondent utility unable to effectuate today's order within 10 days, as required, should file and serve a report, stating the name of each customer granted essential customer status herein whose circuit has not yet been exempted from rotating outages, the reason it has not yet been exempted, and an estimate of when the change will become effective.

13. The Category M status awarded today should be intended to address relative risk for some customers during a temporary State of Emergency that should expire within 24 months.

14. Each respondent utility should individually notify each customer granted Category M essential customer status in today's order that the customer's circuit is, or will become, exempt from rotating outages, and state in the same notice that such status will expire in 24 months.

15. Thirty days before the expiration of Category M status, each respondent utility should notify each customer granted Category M essential customer status that the Category M status will expire 30 days after the date of that notice, absent a specific Commission order to the contrary.

16. A copy of the Exponent Report (Attachment A) should not be included with service of paper copies of the final decision because each Category M and Phase 1 party received a copy of the Exponent Report with the draft decision.

17. Service of copies of applications for rehearing should be limited to the applicant's serving utility (e.g., PG&E, SCE or SDG&E) and the following persons at the Commission: Commissioner Wood, General Counsel Cohen, ALJ Mattson, ALJ Galvin, Jonathan Lakritz, and Laura Martin.

18. The period for public review and comment on the draft decision should be reduced, pursuant to Rule 77.7(f)(9).

19. This order should be effective today so that customers may be included in Category M without delay.

O R D E R

IT IS ORDERED that:

1. Electric generator customers identified in Attachment B, other than those for whom load and resource analysis continues (as shown in Attachment B), are granted essential customer status in Category F (for distribution level customers) or K (for transmission level customers). Respondent utilities Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) shall submit a report within 30 days stating the final load and resource assessment for customers shown in Attachment B where this analysis is not yet complete. The report shall be filed, served on the electric generator customers at issue, and

served on a limited list at the Commission composed of Commissioner Wood, Administrative Law Judge (ALJ) Mattson, ALJ Galvin, Jonathan Lakritz, and Laura Martin. Parties may file and serve comments on the report within 10 days, with service on the respondent utility, and service on the same service list as used for the report.

2. The August 17, 2001 Assigned Commissioner's Ruling (Attachment C) is approved and confirmed. Respondent utilities PG&E, SCE, and San Diego Gas and Electric Company (SDG&E) shall treat Category M applications by 51 customers who provide police, fire, and prison services (Table 7-1 in Exponent Report, Attachment A) as applications for Category A, and consider these applications without unreasonable delay. Respondent utilities shall evaluate the adequacy of standby or backup generation of each of the 51 applicants, and not include any applicant for Category A who has adequate backup or standby generation.

3. Respondent utilities shall include all customers listed in Attachment D as essential customers in Category M. Where Attachment D shows a processing difficulty remains, the customer is granted Category M status conditioned upon satisfactory resolution of the processing difficulty. If the status of an applicant is unresolved at the end of 30 days, the respondent utility whose customer is at issue shall file and serve a report. The report shall state the customer's name, unresolved issue, estimated time to resolve the issue, the utility's recommendation, and anything else reasonably needed for the Commission to assess the matter. The report shall be served on the involved customer, and the following persons at the Commission: Commissioner Wood, ALJ Mattson, ALJ Galvin, Jonathan Lakritz, and Laura Martin. Comments on the report may be filed and served within 10 days of the date of the report. Service of comments

shall be on the respondent utility, and the same persons identified above at the Commission.

4. Where Attachments B and D show a Statement of Authenticity has not been filed, the essential customer status is granted upon the condition that applicant submits a Statement of Authenticity within 60 days. The Assigned Commissioner or Administrative Law Judge may grant a motion for limited extension of the 60-day time limit to submit a Statement of Authenticity for good cause in individual cases. The essential customer status conditionally granted herein shall expire at the end of 60 days if a Statement of Authenticity has not been received, unless a motion for extension has been granted.

5. Respondent utilities shall, within 10 days of today, effectuate the Category M status granted herein by removing from rotating outage the circuit upon which each such customer granted such status is served. Respondent utilities shall effectuate the Category M status conditionally granted herein upon resolution of a processing difficulty within 10 days of the date the processing difficulty is resolved. Respondent utilities shall effectuate the Category M status conditionally granted herein within 10 days of the date of a letter from the Energy Division Director reporting receipt of a Statement of Authenticity. Each respondent utility unable to effectuate circuit exemption shall file a report within 15 days of today, or 15 days of the date circuit exemption is required upon resolution of processing difficulties or late Statements of Authenticity. The report shall state the name of each customer granted essential customer status herein whose circuit has not yet been exempted from rotating outages, the reason, an estimate of when the change will become effective, the utility's recommendation and anything else reasonably needed for the Commission to assess the matter. The report must be filed, served on 5 individuals at the

Commission (i.e., Commissioner Wood, ALJ Mattson, ALJ Galvin, Jonathan Lakritz, Laura Martin), and served on each Category M customer affected by the delay. Comments on the report may be filed and served within 10 days of the date of the report. Service of comments shall be on the respondent utility, and the same persons identified above at the Commission.

6. Category M status granted herein shall expire 24 months from today, unless by specific order the Commission directs otherwise.

7. Respondent utilities shall notify each customer granted Category M essential customer status in this order that the customer's circuit is, or will become, exempt from rotating outages. In that same notice, the utility must inform the customer that such status will expire in 24 months. Further, 30 days before the expiration of Category M status, each respondent utility shall notify each customer granted Category M essential customer status that Category M status will expire 30 days after the date of that notice.

8. Attachment A shall not be included with paper copies of this decision served on the service list.

9. Applications for rehearing must be filed (original plus four copies) and served within 30 days of the date this order is mailed, but service shall be limited to applicant's serving utility and the following persons at the Commission: Commissioner Wood, General Counsel Cohen, ALJ Mattson, ALJ Galvin, Jonathan Lakritz, and Laura Martin.

10. This proceeding remains open.

This order is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT A

**“Recommendations Regarding Exemptions from
Rotating Power Outages” prepared by Exponent
August 2001**

**(Attachment A is a separate document.
Please see separately enclosed document)**

ATTACHMENT B

Electric Generator Applicants

Line No.	FW	Application No.	Company Name	Utility	Net Generator Yes/No	Statement of Authenticity Yes/No
1	*	280169	Enron Wind	SCE	1 Yes; 1 No	No
2		402392	Enron Wind	SCE	No	No
3		1193408	Enron Wind	SCE	Yes	No
4		1273059	Enron Wind	SCE	No	No
5	*	1419390	Enron Wind	SCE	No	No
6	*	1499150	Enron Wind	SCE	No	No
7		1820849	Enron Wind	SCE	Yes	No
8	*	2067736	Enron Wind	SCE	No	No
9		2157763	Enron Wind	SCE	Yes	No
10		2179692	Enron Wind	SCE	Yes	No
11	*	2749957	Enron Wind	SCE	No	No
12		3029193	Enron Wind	SCE	No	No
13		3669146	Enron Wind	SCE	Yes	No
14		3816503	Enron Wind	SCE	Yes	No
15	*	3917101	Enron Wind	SCE	No	No
16	*	4050921	Enron Wind	SCE	1 Yes; 1 No	No
17		5445879	Enron Wind	SCE	No	No
18		5529040	Enron Wind	SCE	No	No
19		6097386	Enron Wind	SCE	Yes	No
20	*	6741503	Enron Wind	SCE	No	No
21		6781023	Enron Wind	SCE	Yes	No
22		6964543	Enron Wind	SCE	No	No
23	*	7004717	Enron Wind	SCE	No	No
24		7024248	Enron Wind	SCE	Yes	No
25	*	7769335	Enron Wind	SCE	No	No
26	*	7813128	Enron Wind	SCE	No	No
27		7977923	Enron Wind	SCE	Yes	No
28	*	8188799	Enron Wind	SCE	No	No
29	*	9602678	Enron Wind	SCE	1 Yes; 1 No	No
30	*	9702580	Enron Wind	SCE	No	No
31		9860857	Enron Wind	SCE	Yes	No
32	*	6344622	Enron Wind	SCE	No	No
33	*	4838841	Enron Wind	SCE	1 Yes; 1 No	No
34		8136461	Zond System – Monolith XII	SCE	Yes	No
35		4125689	Luz Solar Partners VIII & IX	SCE	No	No
36	*	4287846	CTV Management Group	SCE	1 Yes; 1 No	No
37		5254076	Daniel M. Bates (Deer Creek Hydro)	SCE	No	No
38	*	5772417	CTV Management Group	SCE	1 Yes; 1 No	No
39		7511461	Zond Systems Inc.	PG&E	No	No
40	*	7560747	CTV Management Group	SCE	1 Yes; 1 No	No
41		9074877	Zond Systems Inc.	PG&E	Yes	No

FW: Further Work. An asterisk denotes unknown circuit and/or invalid account number, and where the load and resources analysis is not yet complete. Essential customer status is not granted to these customers.

Net generator: Some applications included two accounts, with one account a net generator, and the other not a net generator.

(END OF ATTACHMENT B)

ATTACHMENT C

See separately enclose document titled: "Presiding Officer and Assigned Commissioner's Ruling Directing Respondent Utilities to Treat Category M Applications by Police, Fire and Prisons as Applications for Category A."

ATTACHMENT D
Applicants Granted Category M Status

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
1		7726153	First Responder EMS, Inc.	PG&E	Emergency Services	No
2		2945880	Sequoia Safety Council, Inc.	PG&E	Emergency Services	No
3		4946764	Port of Oakland	PG&E	Transportation	No
4		1826037	State of California - CALTRANS	SCE	Transportation	No
5		7161730	City of Victorville	SCE	Government	No
6		177173	REIT Management & Research, Inc.	SDG&E	Security	No
7		2617816	Casa Pacifica Youth Connection	SCE	Emergency Services	Yes
8		331744	Quest Diagnostics	PG&E	Labs/Blood	No
9		3714770	Westcliff Medical Laboratories, Inc.	SCE	Labs/Blood	No
10		685138	Central California Blood Center	PG&E	Labs/Blood	No
11		4862994	Central California Blood Center	SCE	Labs/Blood	No
12		1696490	Central California Blood Center	PG&E	Labs/Blood	No
13		7305315	Central California Blood Center	SCE	Labs/Blood	No
14		589312	American Red Cross Blood Services	SDG&E	Labs/Blood	No
15		1454638	Jacobsen Pilot Service, Inc.	SCE	Transportation	No
16		4983996	Tri - Counties Blood Bank	PG&E	Labs/Blood	No
17		7800463	Tri - Counties Blood Bank	PG&E	Labs/Blood	No
18		8035906	Tri - Counties Blood Bank	PG&E	Labs/Blood	No
19	*	209979	American Red Cross Blood Services	SCE	Labs/Blood	No
20		9494951	American Red Cross Blood Services	SCE	Labs/Blood	No
21		8259600	California Transplant Services, Inc.	SDG&E	Medical Supplies/Records	No
22		3133563	FFF Enterprises Inc.	SCE	Medical Supplies/Records	No
23		8555162	Mil Spec Heat Treating, Inc.	SCE	Retail	No
24		6113146	Satchmed	SCE	Medical Building	No
25		5600756	Walaka Development	SCE	Medical Building	No
26		2423876	APT Ambulance Company	SCE	Emergency Services	No
27		9359301	ViroLogic, Inc.	PG&E	Labs/Blood	No
28	*	2260760	Elm Long Beach, Ltd	SCE	Medical Building	No
29		277881	Sun Care Health Care	SCE	Nursing Home	No
30		9530199	Sunmar Healthcare	SCE	Nursing Home	No
31		6728075	Butte Home Health Inc.	PG&E	Nursing Home	No
32		1200579	Mariner Post Acute Network	PG&E	Nursing Home	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
33		8863085	Cal Nev Methodist Home dba Pacific Grove Conv. Hosp.	PG&E	Nursing Home	No
34		7609881	Marriott MapleRidge of Palm Springs	SCE	Nursing Home	No
35		7054570	Upland Convalescent Operations, Inc.	SCE	Nursing Home	No
36		1712512	American Red Cross Blood Services	SDG&E	Labs/Blood	No
37		2460607	American Red Cross Blood Services	SDG&E	Labs/Blood	No
38		7711504	American Red Cross Blood Services	SCE	Labs/Blood	No
39		8466051	American Red Cross Blood Services	SCE	Labs/Blood	No
40		8868687	American Red Cross Blood Services	SCE	Labs/Blood	No
41		5348071	American Red Cross Blood Services	SCE	Labs/Blood	No
42		9994677	Royal Gardens of Ojai	SCE	Nursing Home	No
43		4322985	Torrance Medical Associates, LLC	SCE	Medical Building	No
44		3654193	Waterman Industries Inc. (Foundry Division)	SCE	Production	Yes
45		5087298	PPG Industries, Inc.	PG&E	Production	Yes
46		1520556	Dental Alloy Products, Inc./Shogun Precision Castings, Inc.	SCE	Production	No
47		3033618	Commercial Enameling	SCE	Production	No
48		5223864	Techi-Cast Corp.	SCE	Production	No
49		6583117	Johannessen Trading Co.	SCE	Production	No
50		7051823	REIT Management & Research, Inc.	SDG&E	Security	No
51		5118578	UCLA Immunogenetics Center	SCE	Health Service	No
52		8135241	General Grinding, Inc	PG&E	Production	No
53		1687596	Beverly Enterprises Inc	PG&E	Skilled Nursing	No
54		1695117	Sun Health Group/Sunbridge Care Center Fullerton	SCE	Skilled Nursing	No
55		4243334	B.P. Care, Inc. Palm Vista Care	SCE	Skilled Nursing	Yes
56		6441210	Woodside Nursing Center	PG&E	Skilled Nursing	No
57		3385943	Edgewater Convalescent Hospital	SCE	Skilled Nursing	No
58		3759631	Central Convalescent Homes Inc.	PG&E	Skilled Nursing	No
59		374621	SunBridge Care Center for Temple City	SCE	Skilled Nursing	No
60		9683397	Bartlett Care Center	SCE	Skilled Nursing	Yes
61		905475	Monclair Manor Convalescent Hospital	SCE	Skilled Nursing	No
62		896319	Mission Medical Enterprises, Inc. dba Delta Nursing and Rehabilitation Hospital	SCE	Skilled Nursing	No
63		1004381	Mission Medical Enterprises, Inc. dba Kings Nursing and Rehabilitation Hospital	SCE	Skilled Nursing	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
64		7982958	Mission Medical Enterprises, Inc. dba Hanford Nursing and Rehabilitation Hospital	SCE	Skilled Nursing	No
65		9272020	Mission Medical Enterprises, Inc. dba Tulare Nursing and Rehabilitation Hospital	SCE	Skilled Nursing	No
66		600451	Chapman Harbor Skilled Nursing	SCE	Skilled Nursing	No
67		8527544	SunBridge Health Care Corp	SDG&E	Skilled Nursing	No
68		2751940	Quality Nursing Home dba Majestic Pines Care Center	PG&E	Skilled Nursing	Yes
69		7262285	Sunbridge Care Center for Willows	PG&E	Skilled Nursing	No
70		2011889	Lakeshore Convalescent Hospital	PG&E	Skilled Nursing	No
71		5010241	David Kleis III, LLC	SCE	Skilled Nursing	No
72		6677111	Southern California Edison	SCE	Skilled Nursing	No
73		9389012	Beaumont Convalescent Hospital	SCE	Skilled Nursing	No
74		4299334	Beverly Enterprises Inc. Conv. Hospital #570	PG&E	Skilled Nursing	No
75		3895587	Casa Palmera Care Center	SDG&E	Skilled Nursing	Yes
76		4537676	Californian Care Center	PG&E	Skilled Nursing	No
77		6452807	Regenerative Health Systems, Inc. dba Live Oak Living Center	PG&E	Skilled Nursing	No
78		7331560	Santa Ynez Valley Airport Authority	PG&E	Transportation	No
79		4406603	Renaissance at Ocean House	SCE	Nursing Home	No
80		9414995	Planned Parenthood Mar Monte	PG&E	Doctor	No
81		7478350	Planned Parenthood	PG&E	Doctor	No
82		2907580	Planned Parenthood Mar Monte	PG&E	Doctor	No
83		3093432	Planned Parenthood	PG&E	Doctor	No
84		3645037	Planned Parenthood Mar Monte	PG&E	Doctor	No
85		7544420	Planned Parenthood	PG&E	Doctor	No
86		8348253	Planned Parenthood	PG&E	Doctor	No
87		5050219	Pleasant Hill Manor	PG&E	Nursing Home	No
88		6194170	Melencon Corp.	SDG&E	Nursing Home	Yes
89		3992327	Fireside Convalescent Hospital-North American Healthcare	SCE	Nursing Home	No
90		9201525	Arcadia Convalescent Hospital	SCE	Skilled Nursing	No
91		6311053	D&U, LLC dba Mission Lodge	SCE	Skilled Nursing	No
92		1363238	Lakewood Park Manor	SCE	Nursing Home	Yes
93		1883410	Port City Steel	PG&E	Production	No
94		1571782	American Red Cross Blood Services	SCE	Labs/Blood	No
95		2407855	Quest Diagnostics	SDG&E	Labs/Blood	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
96		4344805	Lomita Care Center	SCE	Skilled Nursing	No
97		1875628	Planned Parenthood	PG&E	Doctor	No
98		2384770	Planned Parenthood	PG&E	Doctor	No
99		9691484	Lamplighter Senior Citizens Inn Ltd.	PG&E	Nursing Home	No
100		4928912	BG Nursing Home & Convalescent Hospital, INC	PG&E	Skilled Nursing	No
101	*	3515643	ARV Assisted Living, Inc.	SCE	Nursing Home	No
102		3643315	ARV Assisted Living, Inc.	SDG&E	Nursing Home	No
103		4684771	ARV Assisted Living, Inc.	SCE	Nursing Home	No
104		5031298	ARV Assisted Living, Inc.	SCE	Nursing Home	No
105		8450487	ARV Assisted Living, Inc.	PG&E	Nursing Home	No
106		8599566	ARV Assisted Living, Inc.	PG&E	Nursing Home	No
107		9663103	ARV Assisted Living, Inc.	SCE	Nursing Home	No
108		9747898	ARV Assisted Living, Inc.	SCE	Nursing Home	No
109		3091448	Independant Qual Care/Valley Pointe	PG&E	Nursing Home	No
110		1223925	Lonza Inc.	SCE	Production	No
111		7226275	Cottonwood Healthcare Center	PG&E	Skilled Nursing	No
112		7460039	Walnut Professional LLC	SDG&E	Medical Building	No
113		3694323	SunBridge Care and Rehabilitation for Tustin	SCE	Skilled Nursing	No
114		2788562	St. Michaels Convalescent Hospital	PG&E	Skilled Nursing	No
115		4361590	Vintage Estates of Kentfield	PG&E	Skilled Nursing	No
116		5412157	St. Francis Extended Care INC	PG&E	Skilled Nursing	No
117		4001134	Spring Hill Manor Convalescent Hospital	PG&E	Skilled Nursing	No
118		2439746	Homewood Care Center	PG&E	Skilled Nursing	No
119		4730809	Redding Area Bus Authority	PG&E	Transportation	No
120		3627642	City & Country San Francisco	PG&E	Emergency Services	No
121		2129840	Harsch Investment Properties, LLC, Series A, dba 450 Sutter Building	PG&E	Medical Building	No
122		6194628	Norlyn Builders dba Newport Beach Plaza	SCE	Nursing Home	No
123		1037005	Country Place	PG&E	Nursing Home	No
124		2834948	Beverly Enterprises Inc	PG&E	Skilled Nursing	No
125		2763842	El Paso de Robles Youth Corr. Facility	PG&E	Jail	No
126		291003	Merritt Manor Convalescent	SCE	Skilled Nursing	No
127		1059741	Kaweah Manor Convalescent	SCE	Skilled Nursing	No
128		3025836	Moyles Central Valley Health Care	SCE	Nursing Home	No
129		4063738	Browning Manor Convalescent	SCE	Skilled Nursing	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
130		6100176	Porterville Convalescent Hospital	SCE	Skilled Nursing	No
131	*	1365680	Bancap Investment Group	SCE	Medical Building	Yes
132		5623339	Bancap Investment Group	SCE	Medical Building	Yes
133		6952837	Bancap Investment Group	SCE	Medical Building	Yes
134		9257067	Bancap Investment Group	SCE	Medical Building	Yes
135		4114245	Evas Guest Home	SCE	Nursing Home	No
136	*	5783861	The Breakers of Long Beach	SCE	Nursing Home	Yes
137		531024	Westside Sober Living Centers, Inc dba Promises Residential Treatment Centers	SCE	Nursing Home	No
138		7981432	Westside Sober Living Centers, Inc dba Promises Residential Treatment Centers	SCE	Nursing Home	No
139		7632921	Davita, Union City	PG&E	Dialysis	No
140		8768023	DaVita	SCE	Dialysis	No
141		5359209	Davita Dialysis -Napa	PG&E	Dialysis	No
142		8424852	Imperial Care, Inc.	SCE	Dialysis	Yes
143		2090930	Davita, Antioch	PG&E	Dialysis	No
144		9071215	DaVita, Pleasanton	PG&E	Dialysis	No
145		953387	Davita Inc. San Leandro Dialysis Center	PG&E	Dialysis	Yes
146		8256701	South Hayward Dialysis Center	PG&E	Dialysis	Yes
147		610980	Santa Barbara Artificial Kidney Center, LLC	SCE	Dialysis	No
148		1135272	DaVita (formerly Total Renal Care) Hayward Dialysis	PG&E	Dialysis	Yes
149		1501788	DaVita - Ocean Garden Dialysis Center	PG&E	Dialysis	Yes
150		3939532	DaVita - Community Hemodialysis of San Francisco	PG&E	Dialysis	Yes
151		5286992	DaVita - Potrero Hill Dialysis Center	PG&E	Dialysis	Yes
152		6438921	SR Management	PG&E	Skilled Nursing	No
153		8689898	Lav Care Corporation dba Castle Hill Retirement Village	SCE	Nursing Home	No
154		3438738	Williams Medical Company	SCE	Labs/Blood	No
155		230426	Charles Dunn Real Estate Services, Inc.	SCE	Medical Building	No
156		6189702	DaVita, Inc.	PG&E	Dialysis	No
157		330218	Fowler Convalescent Hospital	PG&E	Skilled Nursing	Yes
158		5156878	Villa Elena Convalescent	SCE	Skilled Nursing	No
159		9256762	Valley Healthcare Center	SCE	Skilled Nursing	No
160		9831407	Stanley Healthcare Center	SCE	Skilled Nursing	No
161		8023546	ViroLogic, Inc.	PG&E	Labs/Blood	No
162		6442583	Crestwood Behavioral Health, Inc.	PG&E	Skilled Nursing	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
163		1375140	Master Cutting & Engineering, Inc.	SCE	Production	No
164		9133623	Acme Castings, Inc	SCE	Production	Yes
165		9432957	Crest Steel Corporation	SCE	Production	No
						No
166		4053515	FLM Ent. dba Lakewood Gardens	SCE	Nursing Home	Yes
167		7600878	Beverly Enterprises dba Reedley Convalescent Hospital	PG&E	Skilled Nursing	Yes
168	*	2299517	Knott Avenue Care Center, Inc.	SCE	Skilled Nursing	No
169		2347277	Camarillo Healthcare, Inc.	SCE	Skilled Nursing	No
170		7173937	Premier Care Simi, LLC dba Simi Valley Care Center	SCE	Skilled Nursing	No
171		6314104	Eastwood Care Center	SCE	Skilled Nursing	No
172		4138659	Summit Professional Medical Center	PG&E	Medical Building	No
173		919207	Hope Manor	PG&E	Skilled Nursing	No
174		6684435	Guardian Industries Corp.	PG&E	Production	Yes
175		2975634	Imperial Convalescent Hospital	SCE	Skilled Nursing	No
176		1050280	La Palma Hospital-Medical Office Building/La Palma Dialysis Center	SCE	Dialysis	No
177	*	7947252	Dr. Robert E. Cole	SCE	Outpatient Care/Surgery	No
178		8411425	Dr. Craig Creasman	PG&E	Outpatient Care/Surgery	No
179	*	1142444	Plastic and Reconstructive Surgery Center	PG&E	Outpatient Care/Surgery	No
180		3164385	Ali Heidari, DO	SCE	Outpatient Care/Surgery	Yes
181		7303789	Dr. Stephen Krant	SDG&E	Outpatient Care/Surgery	Yes
182		1196917	Gary J. Alter, M.D.	SCE	Outpatient Care/Surgery	No
183		9848759	Kaiser Permanente	SCE	Outpatient Care/Surgery	No
184		4496935	Held Properties	SCE	Outpatient Care/Surgery	No
185		7190722	Jane Norton, M.D.	SCE	Outpatient Care/Surgery	No
186		264758	Ventura Outpatient Surgery, Inc.	SCE	Outpatient Care/Surgery	No
187		3692645	Parkside Surgery Institute	SCE	Outpatient Care/Surgery	Yes
188		7346972	Plastic Surgery Assoc	PG&E	Outpatient Care/Surgery	No
189		2020739	Doctor Office	PG&E	Outpatient Care/Surgery	No
190		9161808	Doctor Office	PG&E	Outpatient Care/Surgery	No
191		4992388	Healthsouth Surgery Center of Huntington Beach	SCE	Outpatient Care/Surgery	No
192		2104663	1750 El Camino Medical Building	PG&E	Outpatient Care/Surgery	No
193		5083178	University Cernter Medical Partners	SDG&E	Outpatient Care/Surgery	Yes

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
194		7636583	Mohammed Golshani, MD, Inc.	SCE	Outpatient Care/Surgery	No
195		6612871	DaVita-Fairfield Dialysis Center	PG&E	Dialysis	No
196		9153154	Sun Healthcare Corp.	PG&E	Skilled Nursing	No
197		8846409	Jimmy C Wu DDS	SDG&E	Dentist	No
198		7242296	Morris A. Budak, DDS	PG&E	Dentist	No
199		6875780	Paradise Health Care	PG&E	Skilled Nursing	Yes
200		4165209	Healthsouth SurgiCenter at Woodward Park	PG&E	Outpatient Care/Surgery	No
201		4076861	Rapid Recovery Hyperbarics	SCE	Doctor	No
202		4461230	The Hacienda Retirement Community	PG&E	Nursing Home	No
203		831164	First Imperial Properties, LLC	SCE	Medical Building	No
204		4418963	Driftwood Health Care Center	PG&E	Skilled Nursing	No
205		5002154	Beverly Enterprises Inc	PG&E	Skilled Nursing	No
206		1230029	Sun Healthcare Group	PG&E	Skilled Nursing	No
207		6250780	Frederick S. Wright MD, / General Surgeon	PG&E	Outpatient Care/Surgery	No
208		9827244	Valley Medical Group of Santa Maria	PG&E	Medical Building	No
209		7121447	RES-CARE dba RCCA Services	PG&E	Nursing Home	No
210		8339512	Kearny Mesa Convalescent Hospital	SDG&E	Skilled Nursing	No
211		7948124	Horizon Health and Subacute Center	PG&E	Skilled Nursing	No
212		4424151	Bowers Companies	SCE	Emergency Services	No
213		928058	Heritage Gardens Health Care Center	SCE	Skilled Nursing	No
214		654620	Gerald E. Peters M.D. Inc	PG&E	Outpatient Care/Surgery	No
215		6834276	TAMCO	SCE	Production	No
216		6728533	County of Santa Cruz	PG&E	Jail	No
217		9255083	La Veta Surgical Center, an affiliate of Healthsouth	SCE	Outpatient Care/Surgery	No
218		3086260	DaVita-Vacaville	PG&E	Dialysis	No
219		8680895	Manor Care of Palm Desert	SCE	Skilled Nursing	No
220	*	5263689	Beverly Enterprises Inc., Dept #0559	PG&E	Skilled Nursing	No
221		6597613	Sneath Lane Investment Group	PG&E	Medical Building	No
222		3239154	Sun Health Group	PG&E	Nursing Home	No
223		1313342	Beverly Enterprises	PG&E	Skilled Nursing	No
224		1635913	Manor Healthcare Corporation	SDG&E	Skilled Nursing	No
225		1060962	Dr. Michael Digiacomio	PG&E	Outpatient Care/Surgery	No
226		3631457	Pacific Care Center	PG&E	Skilled Nursing	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
227		2132434	Beverly Enterprises Beverly Manor Petaluma	PG&E	Skilled Nursing	No
228		3364428	Woodbrook Professional Group Drs. Fred, Scott Hanosh; Thomas A. Stewart; Seldin Greer	PG&E	Doctor	No
229		3653430	Vencor Inc #926 dba 19th Ave Healthcare	PG&E	Skilled Nursing	No
230		578784	California Convalescent Hospital	PG&E	Skilled Nursing	No
231		6518420	Timberlake-Forrest, Inc.	PG&E	Skilled Nursing	No
232		6985491	Fifth Avenue Healthcare Center	PG&E	Skilled Nursing	No
233		4185961	San Antonia Urology Medical Group	SCE	Outpatient Care/Surgery	No
234		2682666	Washington Outpatient Surgery Center	PG&E	Outpatient Care/Surgery	No
235		572375	New West Dialysis - New Name - DaVita, Inc.	PG&E	Dialysis	No
236		1822375	DaVita Dialysis	PG&E	Dialysis	Yes
237		6683214	Third Avenue Medical Building Associates	SDG&E	Medical Building	No
238		3980883	SunBridge Healthcare Group, Inc.	SDG&E	Skilled Nursing	No
239		386981	Los Gatos Professional Building Associates, LLC	PG&E	Outpatient Care/Surgery	No
240		7243975	South Bascom Medical Professional Center	PG&E	Dialysis	No
241		3198413	Ygnacio Adobe Building	PG&E	Medical Building	No
242		9215868	Shadowbrook Health Care	PG&E	Skilled Nursing	Yes
243		842761	DaVita, Inc. - Walnut Creek	PG&E	Dialysis	No
244		1260089	American Red Cross Blood Services	SCE	Labs/Blood	No
245		6707018	American Red Cross Blood Services	SCE	Labs/Blood	No
246		6771214	Delano District Skilled Nursing Facility	SCE	Skilled Nursing	No
247		8778246	Guardian Post Acute	PG&E	Nursing	No
248		3738726	Sun Bridge-Park Central	PG&E	Skilled Nursing	No
249		9496325	Sunford Investment Co. dba De Anza View Medical Center	SDG&E	Medical Building	No
250		960254	Orange Show Dental	SCE	Dentist	No
251		379657	Bel Vista Convalescent Hospital	SCE	Skilled Nursing	No
252		5482958	Life Care Center of Corona	SCE	Skilled Nursing	No
253		1521777	Rimrock Villa Convalescent Hospital	SCE	Skilled Nursing	No
254		5851611	San Tomas Convalescent Hospital	PG&E	Skilled Nursing	No
255		9398668	Beauty & Health Medical Center of California	PG&E	Outpatient Care/Surgery	No
256		3325976	Central Coast Institute for Plastic Surgery Gary R. Donath, M.D.	PG&E	Outpatient Care/Surgery	Yes
257		5116137	Oak Park Convalescent Hospital	PG&E	Skilled Nursing	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
258		7908800	Bethany Home Society of San Joaquin County, Inc.	PG&E	Skilled Nursing	No
259		2019061	Richard A Gangnes, M.D., Inc.	SDG&E	Outpatient Care/Surgery	No
260		7234209	Guardian Post Acute	PG&E	Nursing	No
261		3510716	Palmdale Regional Dialysis Center	SCE	Dialysis	No
262		3459033	Victor Szanto	PG&E	Outpatient Care/Surgery	No
263		7258471	The 5th & Palm Corp	SDG&E	Office/Property	No
264		4415606	Robert Mraule, MD, Inc/Monterey Bay Medical Surgery Center	PG&E	Outpatient Care/Surgery	Yes
265	*	6323717	WHC-Six Real Estate L.P.	SCE	Office/Property	No
266		9493229	WHC-Six REal Estate	SCE	Medical Building	No
267		2856158	Robert A. Shuken, D.D.S, Jeffrey L. Foltz, DDS, Inc.	SCE	Outpatient Surgery/Dentist	No
268		8858355	DBa Taradent	PG&E	Outpatient Surgery/Dentist	No
269		1091327	Anthony D. Beech, DDS	PG&E	Outpatient Surgery/Dentist	No
270		8698595	Dr. Robert E. Jarvis II	PG&E	Outpatient Surgery/Dentist	No
271		1415728	Dr Clifford Fowler	PG&E	Outpatient Surgery/Dentist	No
272		9367693	Dr. Clifford Fowler	PG&E	Outpatient Surgery/Dentist	No
273		877551	Nicholas N. Gadler DDS	SDG&E	Outpatient Surgery/Dentist	No
274		4710406	Paul Riley	SCE	Outpatient Surgery/Dentist	No
275		586871	Brian K. Higgins, DDS	PG&E	Outpatient Surgery/Dentist	Yes
276		8285997	G. Robert Osborn, DDS, Inc.	PG&E	Outpatient Surgery/Dentist	No
277		4267291	Ronald Gardner, DDS, Inc.	SCE	Outpatient Surgery/Dentist	No
278		3491948	Young Lee, DDS	SCE	Outpatient Surgery/Dentist	No
279		9132555	Ralph Roberts, DDS	PG&E	Outpatient Surgery/Dentist	No
280		4015215	Oral and Maxillofacial Surgery	PG&E	Outpatient Surgery/Dentist	No
281		6363695	Casey K. Shimane DDS Oral and Maxillofacial Surgery	PG&E	Outpatient Surgery/Dentist	No
282		8447283	NC Oral & Facial Center	SDG&E	Outpatient Surgery/Dentist	No
283		6914690	Robert V. Fontanesi, DDS, Inc.	SCE	Outpatient Surgery/Dentist	Yes
284		5642413	Sunhill Corporation-Owner, Richard Robert Tenant	PG&E	Outpatient Surgery/Dentist	No
285		2220019	Brian C. Blalock DDS, MD	SDG&E	Outpatient Surgery/Dentist	No
286	*	5709093	Brian C. Chung, DDS, M.D.	SCE	Outpatient Surgery/Dentist	No
287		9940050	Robert G. Allen DDS	PG&E	Outpatient Surgery/Dentist	No
288		1950854	Richard Torchia DDS PC	SDG&E	Outpatient Surgery/Dentist	No
289		1627978	Howard J. Winer, DDS, Inc.	SCE	Outpatient Surgery/Dentist	No
290		2310199	Anthony Torres DDS and Kevin Dorsey DDS	SCE	Outpatient Surgery/Dentist	No
291		262774	Harrison D. Fortney DDS	SDG&E	Outpatient Surgery/Dentist	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
292		3192462	Mark Nocera, DDS, Avia Dental Care	SDG&E	Outpatient Surgery/Dentist	No
293		2503222	Gentle Dental Service Corporation	SDG&E	Outpatient Surgery/Dentist	No
294		5665301	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
295		1019153	Ezaki Dental Practice	SCE	Outpatient Surgery/Dentist	No
296		8717669	David R. Crouch, DDS & Associates	SCE	Outpatient Surgery/Dentist	No
297		224017	Gentle Dental Service Corporation	SDG&E	Outpatient Surgery/Dentist	No
298		289935	Gentle Dental Service Corporation	SCE	Outpatient Surgery/Dentist	No
299		673388	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
300		707568	Pacific Dental Services, Inc.	SDG&E	Outpatient Surgery/Dentist	No
301		713214	Gentle Dental Service Corporation	SDG&E	Outpatient Surgery/Dentist	No
302		856145	Gentle Dental Service Corporaton	SCE	Outpatient Surgery/Dentist	No
303		1130084	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
304		1137103	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
305		1159076	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
306		1435107	Gentle Dental Service Corporation	SCE	Outpatient Surgery/Dentist	No
307		1765307	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
308		1975421	Gentle Dental Service Corporation	SDG&E	Outpatient Surgery/Dentist	No
309		2106189	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
310		2455157	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
311		2501086	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
312		2605151	Camarillo Dental Group	SCE	Outpatient Surgery/Dentist	No
313		3018054	Pacific Dental Services	SCE	Outpatient Surgery/Dentist	No
314		3046130	Gentle Dental Service Corporation	SDG&E	Outpatient Surgery/Dentist	No
315		3646105	Pacific Dental Services	SCE	Outpatient Surgery/Dentist	No
316		3889788	Pacific Dental Services	SCE	Outpatient Surgery/Dentist	No
317		4548357	Pacific Dental Services	SCE	Outpatient Surgery/Dentist	No
318		4709490	Inland Empire Dental Group	SCE	Outpatient Surgery/Dentist	No
319		4848803	Stromberg, Louis, Desert Valley Dental	SCE	Outpatient Surgery/Dentist	No
320		5215014	Gentle Dental Service Corporation	SDG&E	Outpatient Surgery/Dentist	No
321		5584124	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
322		5922259	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
323		6190508	Pacific Dental Services	SDG&E	Outpatient Surgery/Dentist	No
324		6326617	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
325		6413897	Gentle Dental Service Corporation	SCE	Outpatient Surgery/Dentist	No
326		6581743	Mission Dental Group	SCE	Outpatient Surgery/Dentist	No
327		6680577	Pacific Dental Services, Inc.	SDG&E	Outpatient Surgery/Dentist	No
328		7282732	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
329		7444475	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
330		7464312	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
331		7860692	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
332		8136309	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
333		8843248	Desert Dental Services	SCE	Outpatient Surgery/Dentist	No
334		9197710	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
335		9449785	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
336		9452074	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
337		9525927	Pacific Dental Services	SCE	Outpatient Surgery/Dentist	No
338		9583910	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
339		9726732	Pacific Dental Services	SCE	Outpatient Surgery/Dentist	No
340		2917956	Guardian Post Acute	PG&E	Nursing	No
341		1793994	Slutsky Dental Corporation	SCE	Outpatient Surgery/Dentist	No
342		2260913	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
343		2466601	GDSC	SCE	Outpatient Surgery/Dentist	No
344		4355792	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
345		5997136	GDSC	SCE	Outpatient Surgery/Dentist	No
346		7937945	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
347		8726213	De La Vina Surgicenter	SCE	Outpatient Care/Surgery	No
348		9556902	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
349		9626024	GDSC	SCE	Outpatient Surgery/Dentist	No
350		9944279	Gentle Dental Service Corporation	PG&E	Outpatient Surgery/Dentist	No
351		8074053	Graybill Medical Group	SDG&E	Outpatient Care/Surgery	No
352		6430485	SunBridge Granada Care and Rehabilitation	PG&E	Skilled Nursing	Yes
353		4140643	Beverly Enterprises, Inc. Convalescent Hospital	PG&E	Nursing Home	No
354		7448900	South Bascom Medical Professional Center	PG&E	Outpatient Care/Surgery	No
355		9289721	Thomas Lile Sycamore Medical	PG&E	Office/Property	No
356		1496905	Temecula Valley Facial and Oral Surgery Center	SCE	Outpatient Surgery/Dentist	No
357		6978167	Bernard I. Raskin, M.D., Inc.	SCE	Outpatient Care/Surgery	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
358		9399736	Bakersfield Dialysis Center Inc	PG&E	Dialysis	No
359		7157305	Palmdale Urology / Valencia Urology	SCE	Outpatient Care/Surgery	No
360		9561022	Franklin Croft Management, Inc.	SDG&E	Medical Building	No
361		7651690	Victor Ho D.M.D.	SCE	Outpatient Surgery/Dentist	No
362		4260729	Sign of The Dove	SCE	Nursing Home	No
363		6437090	Regency Park La Mesa	SDG&E	Nursing Home	No
364		8395250	Amparo Ragudo dba Camden Convalescent Hospital	PG&E	Skilled Nursing	No
365		1878833	HealthSouth San Francisco Surgery Center	PG&E	Outpatient Care/Surgery	No
366		8551348	Bryan Jennings dba Valley View Conv Hosp	PG&E	Skilled Nursing	No
367		413684	Health Care Property Investors, Inc. c/o Prentiss	SDG&E	Medical Building	No
368		723590	Endre Selmeczy D.M.D.	PG&E	Outpatient Surgery/Dentist	No
369		2119006	David J. Tracy, DDS	SDG&E	Outpatient Surgery/Dentist	No
370		6228808	E M Matsushi DDS Inc.	PG&E	Dentist	No
371		6640642	Robert A. Rees DDS, APC	SDG&E	Outpatient Surgery/Dentist	No
372		9607408	Robert L. Fisher, DDS Inc., Dentistry for Children	PG&E	Dentist	Yes
373		2209491	Ric S. Garrison, M.D.	SCE	Outpatient Care/Surgery	No
374		5626849	HCP Medical Buildings II, LLC c/o Prentiss Properties, Ltd.	SDG&E	Medical Building	No
375		9266069	Dr. Sloan Mc Donald, DDS	PG&E	Outpatient Surgery/Dentist	No
376		679644	St. John Kronstadt Care Center	PG&E	Skilled Nursing	No
377	*	7795537	BV Conv Hosp	SCE	Skilled Nursing	No
378	*	2344989	Newport Medical Arts Building, LLC	SCE	Medical Building	No
379		2997454	Philip C. Roberts, DDS	SDG&E	Outpatient Surgery/Dentist	No
380		4048632	Douglas, Emmett & Company	SCE	Medical Building	No
381		480060	Simmons Dental Care	SCE	Outpatient Surgery/Dentist	Yes
382		229815	Dr. Raymond T. Matsunaga Hillside Professional Cen	PG&E	Dentist	No
383		317706	Mary A. Delsol, DDS - Oral and Maxillofacial Surgery	SDG&E	Outpatient Surgery/Dentist	No
384		2723406	Hillside Professional Center	PG&E	Dentist	No
385		4313220	Barry Johnsin, DDS, Inc.	SCE	Outpatient Surgery/Dentist	No
386		6275805	Westlake Eye Surgery Center	SCE	Outpatient Care/Surgery	No
387		5176257	Alamar Dental Center	SCE	Outpatient Surgery/Dentist	No
388		3240832	Heda Koh DDS	PG&E	Dentist	No
389		4574297	Northern California Facial & Oral Surgery	PG&E	Outpatient Surgery/Dentist	No
390		7393664	Northern California Facial & Oral Surgery	PG&E	Outpatient Surgery/Dentist	No

Line No.	FW	Application No.	Company Name	Utility	Business	Statement of Authenticity Yes/No
391		7436846	Paul J. Carroll, DDS, Oral and Maxillofacial Surgery	PG&E	Outpatient Surgery/Dentist	No
392		8285235	Northern California Facial & Oral Surgery	PG&E	Outpatient Surgery/Dentist	No
393		8532732	Northern California Facial & Oral Surgery	PG&E	Outpatient Surgery/Dentist	No
394		8817308	Sid Mirrafati, MD (Mira Aesthetic Medical Center	SCE	Outpatient Care/Surgery	Yes
395		6285723	Los Angeles Pump & Valve Products	SCE	Production	No
396		719317	Thomas S. Adamich, DDS (CDF II)	SCE	Outpatient Surgery/Dentist	No
397		603351	Alpha Therapeutic Corporation	SCE	Dialysis	No
398		1949939	Alpha Therapeutic Corporation	PG&E	Dialysis	No
399		3904131	Alpha Therapeutic Corporation	PG&E	Dialysis	No
400		5582903	Alpha Therapeutic Corporation	SDG&E	Dialysis	No
401		8521898	Alpha Therapeutic Corporation	SDG&E	Dialysis	No
402		8875444	Alpha Therapeutic Corporation	SCE	Dialysis	No
403		7928789	Lane J. Lopez, DDS, Inc.	SCE	Outpatient Surgery/Dentist	No
404	*	8463871	Independent Quality Care	PG&E	Skilled Nursing	No
405		364551	Dr. Fred Bunch	PG&E	Outpatient Surgery/Dentist	No

FW: Further Work. An asterisk denotes unknown circuit and/or invalid account number, or other processing difficulty. Category M status is granted upon the condition that the difficulty is resolved satisfactorily.

Statement of Authenticity: If a Statement of Authenticity has not been submitted, the Category M status is granted on the condition that the Statement is submitted within 60 days.

(End of Attachment D)